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October 15, 2021

**VIA ECF**

Honorable Kevin McNulty  
United States District Judge  
Lautenberg U.S. Post Office & Courthouse  
Federal Square  
Newark, New Jersey 07102

**Re: *United States v. Coburn & Schwartz,***  
**Criminal No. 19-120**

Dear Judge McNulty:

As Your Honor is aware, this firm is co-counsel, along with Paul, Weiss, Rifkind, Wharton & Garrison LLP and Bohrer PLLC, for defendant Steven Schwartz in the above-captioned matter. We respectfully submit this letter to advise the Court of two new redacted filings submitted on the docket earlier today, ECF Nos. 231 and 232, and to clarify their purpose, consistent with prior correspondence. ECF No. 221. These filings relate to defendants' August 20, 2021 reply brief in the L&T subpoena litigation. ECF No. 208. In that reply brief, defendants referenced certain prior filings made either under seal and/or with redactions (specifically ECF Nos. 150 and 202, respectively). Counsel for L&T appropriately requested unredacted copies of those filings, and defendants agreed to seek consent from the Government and Cognizant to provide these documents to counsel for L&T. Your Honor stayed the deadline for L&T to file its reply brief while we sought that consent. ECF No. 221.

The Government promptly indicated to the defense that it does not object to unredacting the redacted information, and finally yesterday, Cognizant indicated that, subject to a few exceptions, it does not object to unredacting certain Cognizant information. Based on these positions, we have filed on the public docket these less redacted versions. The redactions that remain are those upon which Cognizant continues to insist.

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To be clear, the Court may, of course, continue to rely on the unredacted versions of all the briefs with respect to the Cognizant subpoena motion practice (both the fully briefed Category A subpoenas and the Category B subpoenas, as to which briefing will be complete one week from today). With regard to the motion practice with regard to the subpoenas issued to L&T, the parties (both defendants and L&T) will write to the Court when briefing is complete to clarify which portions of the Cognizant briefing the Court may rely upon when deciding those motions.

Thank you for your kind attention to this matter.

Respectfully submitted,



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cc: All Counsel (by ECF)